

[illegible]

**ANSWER TO MOTION TO DISMISS CASE**

1. Debtors have admittedly fallen behind on their Chapter 13 Plan payments due to unforeseen circumstances.
2. On January 26, 2022, Debtors made a payment through electronic means to cure the arrearages.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Wherefore Debtors John J. Smith, III and Carol M. Smith respectfully request that this Honorable Court enter an Order denying Movant's Motion to Dismiss Case.

Respectfully submitted,

LAW OFFICES OF JOHN M. HYAMS

Dated: January 26, 2022

By: /s/ John M. Hyams  
John M. Hyams  
2023 N 2<sup>nd</sup> Street  
Harrisburg, PA 17102  
Attorney for Debtors